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Counsel for Defendant Marshay Goodspeed

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARSHAY GOODSPEED,

Defendant.

No. CR 13-00094 EMC

**STIPULATION ADVANCING  
SENTENCING HEARING;  
~~PROPOSED~~ ORDER**

Current Date: May 28, 2014  
Proposed Date: May 14, 2014  
Time/Place: 2:30 p.m.; Courtroom 5

Due to the unavailability of defense counsel on the sentencing date set by the Court, the parties request that the sentencing hearing in this case be advanced from May 28, 2014, to **May 14, 2014, at 2:30 p.m.**, before this Court.

**BACKGROUND INFORMATION**

On March 13, 2013, Ms. Goodspeed appeared before this Court and entered a plea of guilty on Count 1 of the indictment. At that appearance, the sentencing was set for May 28, 2014, at 2:30 p.m., although the Court stated that the parties may submit a stipulation to advance the sentencing date after obtaining approval from probation.

Counsel for the government has no objection to advancing the sentencing schedule. The Probation Officer, Mark Unalp, has also been contacted and has no objection to advancing the sentencing hearing or the proposed date.

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1 Therefore, counsel request that the Court advance the sentencing hearing in this matter to  
2 **May 14, 2014, at 2:30 p.m.**, and stipulate to same.

3 Respectfully submitted,

4 STEVEN G. KALAR  
Federal Public Defender

5 /s

6 Dated: March 17, 2014

7 BRANDON M. LeBLANC  
Assistant Federal Public Defender

8  
9 IT IS SO STIPULATED.

10 MELINDA HAAG  
United States Attorney

11 /s

12 Dated: March 17, 2014

13 NATALIE LEE  
Assistant United States Attorney

14  
15  
16 **[~~PROPOSED~~] ORDER**

17 For the reasons stated above, and good cause appearing, IT IS HEREBY ORDERED that  
18 the sentencing hearing for Defendant Marshay Goodspeed is ADVANCED from May 28, 2014,  
19 to **May 14, 2014, at 2:30 p.m.**, before the undersigned.

20 IT IS SO ORDERED.

21  
22 Dated: March 19, 2014

23 EDWARD  
United States

